

EXHIBIT “B”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| MATTHEW RALSTON, | : | |
| Plaintiff, | : | CIVIL ACTION |
| v. | : | |
| | : | |
| MITCHELL GARABEDIAN, ESQUIRE, et | : | |
| al, | : | NO. 2:19-cv-01539 |
| | : | |
| Defendants. | | |

GARABEDIAN DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST

Defendants, Mitchell Garabedian, Mitchell Garabedian, Esquire d/b/a Law Offices of Mitchell Garabedian (collectively "Garabedian defendants"), by and through counsel, Swartz Campbell LLC, hereby object to plaintiff's proposed trial exhibits as cumulative of other evidence, unduly prejudicial, character evidence, irrelevant, lacking in foundation, unauthenticated and inadmissible hearsay not subject to any exceptions. Garabedian defendants also object to aggregated documents on the basis that specific documents, pages or portions from the aggregated documents plaintiff intends to use at trial were not identified.

Subject to the foregoing general objections, Garabedian defendants object to plaintiff's specific proposed trial exhibits:

| Exhibit No. | Description | Reason(s) |
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| 2 | Expert Report and CV of Shanin Specter, Esq. | Rule 402 Rule 404 Rule 608 Rule 802 |
| 3 | Expert Report and CV of James C. Schwartzman, Esq. | Rule 402 Rule 404 Rule 608 Rule 802 |

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| 4 | Expert Reports and CV of Barbara Ziv, M.D. | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 4 | Evaluation of Poulos | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 4 | Evaluation of Ralston | Rule 402 Rule 404 Rule 608 Rule 802 |
| 4 | Appendixes A-G | Rule 802 |
| 5 | Expert Report and CV of Andrew Verzilli | Rule 802 |
| 6 | Yearbook Pages 1994 1995 1996 1997 2009 | Rule 402 Rule 608 Rule 802 |
| 7 | Plaintiff's Resume 2020 | Rule 402 Rule 608 Rule 802 |
| 8 | Class of '97 yearbook Photos | Rule 402 Rule 608 |
| 9 | Correspondence re: Departure from Hill | Rule 402 Rule 802 |
| 10 | Student Evals of Plaintiff | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 11 | Note from Student at Andrews School | Rule 402 Rule 404 Rule 608 |

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| | | Rule 802 Rule 901 |
| 12 | Letters from Administrators/Colleagues | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 13 | Speech by Chris Howell | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 14 | Ltr. from Zwerner (Poulos' Cousin) | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 15 | Plaintiff Employment records - Leelanau School | Rule 402 Rule 404 Rule 608 Rule 802 |
| 16 | Hill School Production (K. Poulos) | Rule 402 Rule 404 Rule 608 Rule 802 |
| 17 | Marquette University - Kurtis Poulos | Rule 402 Rule 802 |
| 18 | Kurtis Poulos Unofficial Undergraduate Transcript - Marquette University | Rule 402 Rule 802 |
| 19 | Marquette University - Mary Ellen Poulos | Rule 402 Rule 802 |
| 20 | Mary Ellen Poulos Unofficial Transcript - Marquette University | Rule 402 Rule 802 |
| 21 | Records of Charles Grade (K. Poulos) | Rule 402 Rule 403 Rule 404 |

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| | | Rule 608 Rule 802 |
| 22 | Plaintiff's Income Tax Returns | Rule 402 Rule 802 |
| 23 | Mary Ellen Poulos Production | Rule 402 Rule 802 |
| 24 | Hill School Production - Plaintiff | Rule 402 Rule 404 Rule 608 Rule 802 |
| 25 | Ph.D. Dissertation Acknowledgement | Rule 402 Rule 404 Rule 608 Rule 802 |
| 26 | Note from Dismissed Hill Student | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 27 | The Hill School Bulletin references | Rule 402 Rule 802 |
| 28 | Text Messages Re: Wallace Gundy | Rule 402 Rule 403 Rule 608 Rule 802 |
| 29 | Upper School East Photo | Rule 402 Rule 403 Rule 608 |
| 30 | '94 - '95 Geometry Materials | Rule 402 Rule 403 |
| 31 | '94 - '95 Geometry Student Reviews | Rule 402 Rule 404 Rule 608 Rule 802 Rule 901 |
| 32 | '94 - '95 Math 4 Student Reviews | Rule 402 Rule 404 |

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| | | Rule 608 Rule 802 Rule 901 |
| 33 | Campus Map | Rule 402 |
| 34 | Floor Plans/Permits Upper School Basement - The Hill School | Rule 402 |
| 35 | Verizon Records, K. Poulos | Rule 402 |
| 36 | Hill School Leave/Departure Correspondence (2019) | Rule 402 Rule 802 |
| 37 | American Strategic Insurance Records (Poulos) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 38 | Medical Records of Lisa Havens (Plaintiff -Psych) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 39 | Medical Records of Phillip Seimer, M.D. | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 40 | Medical Records of Nathan March, D.O. | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 41 | Medical Records of Pottstown Medical Specialists (Goldberg) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 42 | Handwritten Notes of Plaintiff | Rule 402 |

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| | | Rule 802 |
| 43 | State of Maryland Criminal Records - Poulos | Rule 105 Rule 402 Rule 404 Rule 901 |
| 44 | Milwaukee Circuit Court Criminal Records - Poulos | Rule 105 Rule 402 Rule 404 Rule 901 |
| 45 | Worcester County Criminal Records - Poulos | Rule 105 Rule 402 Rule 404 Rule 901 |
| 46 | Affidavit of Kerith Iverson Brand | Rule 402 Rule 802 Rule 901 |
| 47 | Cozen O' Conner Production | Rule 402 Rule 802 Rule 901 |
| 48 | Correspondence w/ Hill School (Counsel) | Rule 402 Rule 802 Rule 901 |
| 49 | Social Security Calculator | Rule 402 Rule 901 |
| 50 | Andrews School Employment File | Rule 402 Rule 802 Rule 901 |
| 51 | Cards/Notes to Plaintiff (formerly P8) | Rule 402 Rule 608 Rule 802 Rule 901 |
| 52 | Capital Giving Office Webpage (formerly P51) | Rule 402 Rule 802 Rule 901 |
| 53 | Poulos Cumulative correspondence with The Beasley Firm | Rule 402 Rule 802 |

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| 54 | Hill School Supplemental Production ("HILLRAL") | Rule 402 Rule 802 Rule 901 |
| 55 | Garabedian Production. November, 2020. ("Garabedian") | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 56 | Garabedian File Production. March, 2021. Garabedian_File 1-273 (Poulos File) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 57 | Garabedian File Production. March, 2021. Garabedian_File 274-1244 (Poulos Medical Records) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 58 | Garabedian File Production. March, 2021. Garabedian_File 1245-1853 (Poulos Medical Records) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 59 | Garabedian File Production. March, 2021. Garabedian_File 1854-1960 (Misc. Correspondence) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 60 | Garabedian File Production. March, 2021. Garabedian_Email 1-129 (Emails) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802 |
| 61 | Leslie Gomez Privilege Log and Documents | Rule 402 |

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| | | Rule 802 |
| 62 | Depositions of Kurtis Poulos (Cumulative) (Transcripts and/or video recording) | Rule 105 Rule 402 Rule 802 |
| 63 | Depositions of Matthew Ralston (Cumulative) (Transcripts and/or video recording) | Rule 402 Rule 802 |
| 64 | Deposition of Mitchell Garabedian, Esq. (Transcript and/ or video recording) | Rule 402 |
| 65 | Deposition of Daniel Mahoney, Esq. (Transcripts and/or video recording) | Rule 402 Rule 802 |
| 66 | Deposition of Nathan Gaul, Esq. (Transcript and/or video recording) | Rule 402 Rule 802 |
| 67 | Deposition of Mary Ellen Poulos (Transcript and/or video recording) | Rule 402 Rule 802 |
| 68 | Deposition of Zachary Brusko (Transcript and/or video recording) | Rule 402 Rule 802 |
| 69 | Deposition of Charles Grade, M.D. (Transcript and/or video recording) | Rule 105 Rule 402 Rule 403 Rule 802 |
| 70 | Deposition of Mark Ralston (Transcript and/ or video recording) | Rule 402 Rule 802 |
| 71 | Deposition of Mary Beth Ralston (Transcript and/or video recording) | Rule 402 Rule 802 |
| 72 | Deposition of Christopher Chirieleleson (Transcript and/or video recording) | Rule 402 Rule 802 |

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| 73 | Deposition of William Yinger (Transcript and/or video recording) | Rule 402 Rule 802 |
| 74 | Deposition of Christopher Hopkins (Transcript and/or video recording) | Rule 402 Rule 802 |
| 75 | Deposition of Zachary Lehman (Transcript and/ or video recording) | Rule 402 Rule 802 |
| 76 | Deposition of Leslie Gomez (Transcript and/ or video recording) | Rule 402 Rule 802 |
| 77 | Deposition of Thomas Rees (Transcript and/or video recording) | Rule 402 Rule 802 |
| 78 | Deposition of Andrew Verzilli (Transcript and/or video recording) | Rule 402 Rule 802 |
| 79 | Deposition of Shanin Specter, Esq. (Transcript and/ or video recording) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 80 | Deposition of Barbara Ziv, M.D. (Transcript and/or video recording) | Rule 402 Rule 403 Rule 404 Rule 608 Rule 802 |
| 81 | Deposition of Robert Tintner, Esq. (Transcript and/or video recording) | Rule 402 Rule 802 |
| 82 | Deposition of Clifford Haines, Esq. (Transcript and/or video recording) | Rule 402 Rule 802 |
| 83 | Deposition of Frank Fetterolf, M.D. (Transcript and/or video recording) | Rule 402 Rule 802 |

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| 84 | Deposition of Ben Walborn (Transcript and/or video recording) | Rule 402 Rule 404 Rule 608 Rule 802 |
| 85 | Expert Report and CV of Robert Tintner, Esq. | Rule 402 Rule 802 |
| 86 | Expert Report and CV of Clifford Haines, Esq. | Rule 402 Rule 802 |
| 87 | Expert Report and CV of Gladys Fenichel, M.D. | Rule 402 Rule 802 |
| 88 | Expert Report and CV of Frank Fetterolf, M.D. | Rule 402 Rule 802 |
| 89 | Expert Report and CV of Stephen Scherf, CPA | Rule 402 Rule 802 |
| 90 | Expert Report and CV of Michael Smychynsky, MBA | Rule 402 Rule 802 |
| 91 | Plaintiff's Cumulative Responses to Discovery | Rule 402 Rule 802 |
| 92 | Defendants' Cumulative Responses to Discovery | Rule 402 Rule 802 |
| 93 | Plaintiff's Discovery Requests to Defendant Poulos | Rule 105 Rule 402 Rule 802 |
| 94 | Defendant Poulos' Answer to Second Amended Complaint | Rule 105 Rule 402 Rule 802 |
| 95 | Defendant Poulos' Motion to Dismiss SAC | Rule 105 Rule 402 Rule 802 |
| 96 | Defendant Poulos' Motion for Judgment on the Pleadings | Rule 105 Rule 402 Rule 802 |
| 97 | Defendant Poulos' Motion for Protective Order | Rule 105 Rule 402 Rule 802 |

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| 98 | Defendant Poulos' Cross-Claim Against Defendant Garabedian | Rule 105 Rule 402 Rule 802 |
| 99 | Defendant Poulos' Motion for Summary Judgment | Rule 105 Rule 402 Rule 802 |

Respectfully submitted,

/s/ Candidus K. Dougherty
Jeffrey B. McCarron
Candidus K. Dougherty
SWARTZ CAMPBELL LLC
One Liberty Place, 38th Floor
1650 Market Street
Philadelphia, PA 19103
Phone (215) 299-4296
Fax (215) 299-4301

Date: December 21, 2021